

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EASTERN DIVISION

No. 05-10849RGS

HELEN RUNGE, Plaintiff v. WALTER J. KELLY, KERRY L. BLOOMINGDALE, M.D., and SUNBRIDGE NURSING AND REHABILITATION CENTER, Defendants
--

**DEFENDANT WALTER J. KELLY'S MOTION TO COMPEL
THE PLAINTIFF TO PROVIDE SIGNED ANSWERS TO INTERROGATORIES**

NOW COMES the Defendant, Walter J. Kelly, and moves this honorable Court to compel the plaintiff, Helen Runge, to provide signed Answers to Interrogatories. In support of this motion, the Defendant incorporates the accompanying memorandum of law.

WHEREFORE, Defendant respectfully requests that this Honorable Court compel the Plaintiff to provide signed answers to interrogatories.

Respectfully submitted,
The Defendant, Walter J. Kelly,
By his attorneys,

s/ Michele Carlucci
George C. Rockas, BBO #544009
Michele Carlucci, BBO #655211
WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP
155 Federal Street
Boston, MA 02110
(617) 422-5400

LOCAL RULE 7.1 CERTIFICATION

I, Michele Carlucci, counsel for the Defendant, Walter J. Kelly, certify that I have spoken with both Attorney Andrea Dean and Glenn Davis, counsel for the Plaintiff, requesting answers to interrogatories signed by the Plaintiff, but have received none to date.

Dated: October 5, 2006

s/ Michele Carlucci
Michele Carlucci

CERTIFICATE OF SERVICE

I, Michele Carlucci, certify that on October 5, 2006 I have served a copy of the following by electronic filing and regular mail:

1. Defendant Walter J. Kelly's Motion to Compel The Plaintiff to Provide Signed Answers to Interrogatories.

to all counsel of record:

James S. Hamrock, Esq.
Hamrock & Tocci
101 Main Street, 18th Floor
Cambridge, MA 02142

Blake J. Godbout, Esq.
Blake J. Godbout & Associates
33 Broad Street, 11th Floor
Boston, MA 02109

Glen R. Davis, Esq.
Latsha Davis Yohe & McKenna, P.C.
1700 Bent Creek Boulevard, Suite 140
Mechanicsburg, PA 17050

Robert J. Roughsedge, Esq.
Michael Williams, Esq.
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210-2414

/s/ Michele Carlucci
Michele Carlucci